

Exhibit 10

About Pitt McGehee Palmer Bonanni & Rivers

Pitt McGehee Palmer Bonanni & Rivers is Michigan's leading discrimination and civil rights firm. Beyond securing monetary relief for those harmed by systemic failures, we have developed innovative strategies to effectuate lasting changes in broken institutions and organizations that deliver vital services to the public. Through our commitment to restorative justice and high-level pro bono work, we have established ourselves as nationally recognized leaders in holding powerful entities accountable and restoring dignity to survivors across Michigan and beyond.

As steadfast advocates for survivors of institutional abuse, Pitt McGehee Palmer Bonanni & Rivers has secured far-reaching and landmark legal rulings from the United States Supreme Court, the Michigan Supreme Court, the Sixth Circuit Court of Appeals, and Federal District Courts. To date, our team has served as Class or Lead Counsel in dozens of high-profile sexual abuse cases against powerful institutions including Michigan State University, USA Gymnastics, the FBI, University of Michigan, and Eastern Michigan University. Additionally, we have fearlessly confronted systemic injustice in the Flint water crisis litigation and pursued accountability in discrimination claims against Ford Motor Company, the Michigan Department of Corrections, and other major corporations.

About Megan Bonanni



Megan Bonanni is a Partner at Pitt McGehee Palmer Bonanni & Rivers and one of Michigan's most respected advocates for civil rights and survivors of sexual abuse and harassment. Over her decades-long career, Megan has built a national reputation for handling complex cases with extraordinary compassion and resolve.

Megan's work spans a range of landmark litigation, with a particular focus on institutional accountability and sexual assault.

Relevant career achievements include:

- **Larry Nassar Litigation:** Megan served on the Survivors' Creditor Committee with 8 other attorneys representing over 400 victims of former Olympic women's gymnastics team doctor Larry Nassar, securing a \$390 million recovery against USA Gymnastics and the United States Olympic Committee.
- **FBI:** Megan served as co-lead in securing a \$138.7M settlement with the FBI over its failure to act on Nassar's assault allegations, representing 77 of the 139 former gymnast claimants.
- **Michigan State University:** Served as co-lead of a coalition of over 40 law firms in the second wave of Nassar cases filed against Michigan State University, with settlements exceeding \$160M.
- **University of Michigan – Dr. Robert Anderson Litigation:** Megan was appointed to the Plaintiffs' Steering Committee, representing over 1,000 victims of Dr. Robert Anderson and helped secure a \$490 million settlement.
- **Eastern Michigan University Litigation:** Megan represented over 30 students who alleged that the Title IX office and campus fraternities concealed numerous complaints of sexual assault, fostering a dangerous campus environment and helped to secure a \$3.9M settlement.
- **University of Kentucky – Lars Jorgensen Litigation:** Megan currently represents former members and coaching staff of the University of Kentucky swim team who allege former Head Coach Lars Jorgensen sexually abused and/or harassed them.
- **Wolverine World Wide:** \$54 million class action against 3M and Wolverine World Wide in PFAS ground water contamination nuisance litigation.

- **Déjà vu:** \$11.3 million collective action settlement on behalf of exotic dancers working at a Déjà Vu gentleman's club who were not paid a minimum wage as required under the Fair Labor Standards Act (FLSA). Other notable cases Megan has worked on include:
- **Oxford:** Megan is co-counsel for the family of Hana St. Juliana, a victim of the 2021 Oxford High School shooting.
- **Edenville:** Megan serves with a coalition of Michigan attorneys representing thousands of victims of the 2020 Edenville Flood.
- **Oakland County Sheriff's Office (OSCO) Lawsuits:** Megan represents family members in lawsuits against the Oakland County Sheriff's Office (OCSO), alleging that officers refused to respond accordingly when alerted to Monica Cannady's dire mental health crisis, which resulted in the deaths of Monica and her two young sons.
- **Hillsdale College Lawsuit:** Megan represents two current and former students from Hillsdale College, both of whom allege the college failed to adequately respond to their rape reports, thereby fostering a dangerous campus environment.
- **Promedica's Bixby Autism Center Litigation:** Megan successfully advocated for autistic children who were physically abused by their teachers, highlighting systemic issues in care facilities.
- **Ford Motor Company:** Over the course of 20 years, Megan has served as co-counsel in a series of group actions representing long term Ford Motor Company employees who were targeted for layoff based on age and proximity to retirement milestones.

Beyond her legal work, Megan is dedicated to institutional reform to assist survivors of sexual assault. She holds a leadership role on the Restorative Justice Task Force, collaborating with USA Gymnastics and the USOPC to implement historic non-monetary commitments focused on accountability, reconciliation, and cultural transformation in the gymnastics community. Additionally, Megan is working with Michigan legislators to reform statutes of limitations that often prevent survivors from seeking justice due to delayed trauma responses.

In recognition of her decades-long commitment to civil rights and survivor advocacy, Megan was named *Michigan Lawyers Weekly's* [2024 "Lawyer of the Year"](#), an honor voted on by her peers for her outstanding contributions to Michigan's legal landscape.

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About Kevin Carlson



Kevin Carlson is a Partner at Pitt McGehee Palmer Bonanni & Rivers and a leading voice in civil rights litigation against powerful institutions. Since joining the firm in 2006, Kevin has built a distinguished career representing individuals across the employment spectrum and challenging systemic abuses in both state and federal court.

Kevin's work is grounded in the belief that institutions must be held accountable when they violate the public trust. He is known for his strategic litigation approach and deep experience navigating complex, multi-plaintiff and class action matters involving schools, public employers, and corporate defendants.

Relevant career achievements include:

- **Oxford High School Litigation:** Kevin represents victims and families of the 2021 Oxford High School shooting in a case alleging that systemic failures by school officials enabled the tragedy. He recently presented oral arguments on their behalf before the U.S. Court of Appeals for the Sixth Circuit.
- **Edenville Dam Litigation:** As part of the firm's leadership team, Kevin represents hundreds of Michigan residents who suffered catastrophic losses when the Edenville Dam collapsed in 2020. The litigation targets government entities and

corporate actors whose negligence led to one of the state's most devastating infrastructure failures.

- **Bauserman v. Unemployment Insurance Agency:** Kevin served as plaintiffs' class counsel in this landmark class action on behalf of thousands of Michigan residents falsely accused of unemployment fraud. After two victories at the Michigan Supreme Court, the case concluded with a \$20 million class settlement.
- **Logan v. MGM Grand Detroit Casino:** While directing the newly formed Pro Se Legal Assistance Clinic at Detroit Mercy Law, Kevin helped secure a groundbreaking decision from the U.S. Court of Appeals for the Sixth Circuit. The Court held that employers cannot alter or shorten the statutory time period to bring Title VII employment discrimination claims.

Kevin began his legal career as a judicial clerk for the Honorable Arthur J. Tarnow of the U.S. District Court for the Eastern District of Michigan. He joined Pitt McGehee as an associate in 2006 and served as Of Counsel from 2016 to 2019 before becoming a partner in 2020.

Throughout his career, Kevin has balanced active litigation with a commitment to expanding access to justice and mentoring future legal advocates. At Detroit Mercy Law School, he served as the first adjunct professor to lead the school's Federal Pro Se Legal Assistance Clinic, providing guidance and limited-scope representation to unrepresented litigants in federal court. He also previously supervised federal appellate litigation by law students at the University of Michigan Law School.

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About Danielle Young Canepa



Danielle Canepa is an attorney at Pitt McGehee Palmer Bonanni & Rivers. She represents plaintiffs in civil rights and employment claims, including claims for sexual harassment, retaliation, and discrimination. Danielle devotes a substantial part of her practice to representing survivors of sexual assault. She works closely with every client to tell their story, navigate the legal process, and find resolution.

Danielle has represented college students, autoworkers, executives, construction workers, educators, and HR professionals. Relevant career achievements include:

- **Eastern Michigan University Litigation:** Assisted Partner Megan Bonanni in representation of over 30 students asserting that the university Title IX Office and campus fraternities concealed widespread complaints of sexual assault, including repeat assaults by specific individuals, fostering a dangerous and sexually discriminatory campus environment. *Jane Doe 1, et al. v. EMU, et al.*, Case No. 2:21-cv-10649 (E.D. Mich, filed Mar. 24, 2021).
- **Wayne County Detention Class Action:** Assisting Partners Megan Bonanni and Kevin Carlson in class action on behalf of plaintiffs who were over-detained at the Wayne County Criminal Justice Center for five or more days after a judge ordered

their release, in violation of the Fourteenth Amendment pursuant to 42 USC §1983. *JWest-Campeau et al. v. Dunlap et al.*, Case No. 2:24-cv-12751 (E.D. Mich, filed Oct. 17, 2024).

- **Detroit Pistons Sexual Harassment Action:** Counsel alongside Megan Bonanni for DeJanai Raska in sexual harassment action against the Detroit Pistons Organization and Robert Murphy, the former Pistons Assistant General Manager, asserting violations of Title VII of the Civil Rights Act and the Michigan Elliot-Larsen Civil Rights Act. *Raska v. Detroit Pistons Org., et al.*, Case No. 2:24-cv-10214 (E.D. Mich, filed Jan. 26, 2024).
- **Lead Author of the Amicus Brief in Stegall v Resource Technology Group before the Michigan Supreme Court on behalf of the Michigan Association for Justice.** In Stegall, the plaintiff contended that he was fired because he complained to supervisors about asbestos and filed a complaint under the Michigan Occupational Safety and Health Act (MiOSHA). The trial court ruled that MiOHSA's antiretaliation provision preempted a common law public policy claim of retaliation, even though MiOHSA had taken no action to investigate or remedy Stegall's report. The amicus brief argued that a common law claim for termination in violation of public policy is not preempted by MiOSHA or OSHA because those statutes provide inadequate and ineffective remedies. The Michigan Supreme Court adopted a substantial part of the reasoning in the Amicus Brief and held that statutory retaliation claims under MiOHSA or OSHA do not preempt a public policy claim of retaliation because the respective remedies are cumulative, not exclusive.
- **Family and Medical Leave Act Litigation:** Danielle regularly represents individuals who face retaliation for taking leave under the Family and Medical Leave Act. See, e.g., *Franco v. Smartsheet* (W.D. Mich, filed Oct. 29, 2021); *Fox v. USMM*, Case No. 2:21-cv-11785 (E.D. Mich, filed Aug. 3, 2021); *Gessel v. Smartsheet*, Case No. 2:23-907 (W.D. Wash, filed May 3, 2023); *Kahn v. Marelli*, Case No. 3:23-cv-12353 (E.D. Mich, filed Sept. 15, 2023).
- **Legislative Testimony:** In June 2024, Danielle was invited to testify before the Michigan House Criminal Justice Committee in support of HB No. 5788 (The Uniform Public Expression Protection Act), a bill to protect First Amendment speakers from retaliatory defamation lawsuits known as "SLAPP suits." The bill subsequently passed committee with full unanimous bipartisan support.

Danielle is an active member of the Michigan Association for Justice and the National Employment Lawyers Association. She has previously served on the Diversity Committee for the Federal Bar Association for the Eastern District of Michigan and on a number of committees for her alma mater, Mercy High School.

Danielle joined Pitt McGehee Palmer Bonanni & Rivers after clerking for the Honorable Laurie J. Michelson in the U.S. District Court for the Eastern District of Michigan, the Honorable Robert Pitman in the Western District of Texas, and for two federal magistrate judges in the Western District of Texas. Before her clerkships, Danielle was a litigation associate at Covington & Burling in Washington, D.C. As a law student, Danielle served as a legal intern with the ACLU of Michigan in Detroit, the Civil Rights Division at the U.S. Department of Justice, and the Public Defender Service for the District of Columbia. She graduated from Harvard Law School cum laude and received an award for providing over a thousand hours of pro bono service during law school.